

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

THE PEOPLE OF THE STATE OF NEW YORK
by LETITIA JAMES, Attorney General of the State
of New York,

Plaintiff,

v.

DIOCESE OF BUFFALO, RICHARD J.
MALONE, EDWARD M. GROSZ, and EDWARD
B. SCHAFENBERGER, in his capacity as
Apostolic Administrator for the Diocese of Buffalo,

Defendants.

No. 1:21-cv-00189-RA

DECLARATION OF TODD R. GEREMIA

I, TODD R. GEREMIA, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am a partner in the law firm Jones Day, counsel for the Catholic Diocese of Buffalo and its former Apostolic Administrator Edward B. Scharfenberger (collectively, the “Diocese”) in this action. I submit this declaration in support of the Diocese’s opposition to the Office of the Attorney General’s (“OAG”) motion to remand this action to state court.

2. Attached as Exhibit A is a table that sets out allegations in the Complaint which expressly allege that a defendant in this action violated an ecclesiastical law, policy, norm, procedure, or other internal guidance of the Roman Catholic Church.

3. Attached as Exhibit B is a table that sets out allegations in the Complaint which expressly allege that a defendant in this action violated a provision of New York State law.

4. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed in Yonkers, New York, on March 15, 2021.



TODD R. GEREMIA